

**MEMO ENDORSED***Via ECF*

The Honorable Valerie Figueredo  
 United States Magistrate Judge  
 Southern District of New York  
 Daniel Patrick Moynihan United States Courthouse  
 500 Pearl Street  
 New York, New York 10007

Re: *The Federal Republic of Nigeria v. VR*  
 Case No. 1:21-mc-007-JGK-VF (S.D.N.Y.)

*Valerie Figueredo*  
**HON. VALERIE FIGUEREDO  
 UNITED STATES MAGISTRATE JUDGE**

Dated: 11-16-2022

Based on the parties' joint representation that they have reached a negotiated resolution of the remaining discovery disputes, the conference scheduled for today to address those disputes is canceled. Because the parties have indicated that they reached a resolution as to the "dispute concerning the confidential shareholder arbitration documents," the Court assumes that the objections raised by VR Respondents (see ECF No. 63) as to my ruling concerning those documents is now moot. If that is the case, VR Respondents are directed to notify the district judge that the objections raised in their brief at ECF No. 63 are moot.

Dear Judge Figueredo,

The parties in the above-referenced action<sup>1</sup> respectfully submit this joint letter to update the Court regarding the discovery dispute that is scheduled to be discussed with Your Honor during a teleconference on November 16, 2022, at 1:00 p.m.

Through further discussion between counsel, the parties have reached a negotiated resolution concerning the remaining discovery disputes from the November 1, 2022 hearing, including the dispute concerning the confidential shareholder arbitration documents that are the subject of the parties' recent letters. *See* ECF Nos. 57 & 61. The parties hereby notify the Court that there are no current discovery disputes that require Your Honor's intervention.

Accordingly, the parties respectfully request that Your Honor cancel the teleconference that is scheduled for November 16, 2022. The parties apologize for the timing of this letter and note that consent to the negotiated resolution had to be coordinated with counsel and parties overseas and was not obtained until this morning of November 16, 2022.

Respectfully,

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<sup>1</sup> The parties are applicant The Federal Republic of Nigeria ("Nigeria") and respondents VR Advisory Services, Ltd., VR Advisory Services (USA) LLC, VR Argentina Recovery Onshore Fund II, L.P., VR Global Onshore Fund, L.P., Ashok Raju, and Jeffrey Johnson (the "VR Respondents").